

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE JP MORGAN CHASE & CO. SECURITIES
LITIGATION

MDL No. 1783

Master Docket No. 06 C 4674

This Document Relates to:

Hyland v. Harrison, et al. No. 06 C 4675

Hyland v. J.P. Morgan Securities, Inc., No. 06 C 4676

**MOTION OF HYLAND PLAINTIFFS' LEAD COUNSEL FOR AN
AWARD OF ATTORNEY'S FEES AND REIMBURSABLE EXPENSES**

Lead counsel in the above-referenced actions, Joseph N. Gielata ("Lead Counsel"), pursuant to Fed. R. Civ. P. 23(h) and 54(d), and Local Rule 54.3, files this Motion for an Award of Attorney's Fees and Reimbursable Expenses for the legal services he has provided to the class (as defined in this Court's July 8, 2008 Order) since 2005.

Lead Counsel respectfully moves this Court for entry of an Order: (a) awarding attorney's fees of \$3.6 million; and (b) awarding \$18,170.94 for reimbursement of expenses incurred in this litigation. In support of this motion, the following submissions are being filed concurrently herewith: (a) the *Memorandum Of Law In Support Of Joseph N. Gielata's Motion For Approval Of Attorney's Fees And Expenses* (annexed as Tab B to the parties' Local Rule 54.3 Joint Statement); (b) the *Affidavit Of Joseph N. Gielata In Support Of Class Action Settlement And Award Of Attorney's Fees And Expenses*.

WHEREFORE, Lead Counsel respectfully requests that the Court grant an Order granting the relief set forth above, as well as such other and further relief as the Court may deem just and proper.

DATED: September 16, 2008

Respectfully submitted,

/s/ Joseph N. Gielata
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Hyland v. J.P. Morgan Securities, Inc.*